



Alaska Department of Education & Early Development
Guidance on Collection and Use of Income Data for
Free & Reduced Lunch Program and
Economically Disadvantaged Status for Title I and School Accountability
April 2014

Family income data is used for determining eligibility for free or reduced price lunches for a school lunch program. The same income data is usually used to determine a school's percentage of economically disadvantaged (or "low income") students for determining if the school is eligible for Title I, Part A funding and services. It is also required for determining which students meet the income criteria as defined by Alaska regulations (4 AAC 06.830 and 06.899(5)) for the economically disadvantaged subgroup for school and district accountability. Finally, this data is used to determine a school's eligibility for funding under the federal E-Rate program that supports school internet access. Individual students that meet the income criteria for economically disadvantaged must be reported in both the spring Participation Rate data collection and the Summer OASIS data collection.

These requirements have raised questions from districts on how to obtain family income data to determine which students meet the economically disadvantaged criteria if a school meets any of the following criteria:

- A school does not offer a lunch program;
- A school has been determined to be a Provision 2 or Provision 3 school under the school lunch program and is not required to collect household applications every year; or
- A school is participating as a Community Eligibility Provision school.

The following questions and answers are provided to address these issues.

1. How is data collected to determine eligibility for the school lunch program?

Eligibility data for the school lunch program comes from one or more sources:

- Families complete household applications to verify their income level to determine if their students qualify for free lunches or reduced price lunches.
- In addition, EED staff provides data from Health and Social Services monthly to each district as a "direct certification" list of students that are eligible for free lunches without requiring a household application. These students are eligible based on participation in programs such as the Temporary Assistance for Needy Families (TANF), Food Stamps, or Foster Care
- Migrant students and homeless students are categorically eligible for free lunches through their eligibility for those programs.

2. What is direct certification data and how is it used?

Direct certification data is a list of students who live in a district who are automatically eligible to receive free lunch because their family is already qualified through another assistance program. This data is provided to EED by the Department of Health and Social Services. EED provides this confidential information to each district for the purposes of determining which students automatically qualify for free lunch. This minimizes requiring families to fill out additional applications.

3. What does it mean to operate as a Provision 2 or Provision 3 school?

Based on the income data from direct certification and household applications for a given year (called the base year), a school with a high poverty rate may be eligible to operate as a Provision 2 or 3 school under the National School Lunch Program. This means that all students in the school are provided school meals at no cost, and the district is reimbursed by the state according to the poverty percentage of the eligibility determination during that base year. The eligibility may remain in effect for up to 5 years without collecting new household applications.

4. What does it mean to operate as a Community Eligibility Provision school?

Under the Community Eligibility Provision, household applications are not received and school eligibility is determined only by those children categorically eligible (through direct certification or specific category of eligibility) for free meals. The school then receives an enhanced reimbursement rate by taking the rate of children categorically eligible times a multiplier provided by USDA (for school year 2014-2015 that multiplier is 1.6%)

5. How is data collected to determine whether a student meets the economically disadvantaged criteria if a school does not have a lunch program or if it is not collecting household applications in a given school year?

Schools that do not offer lunch programs (including correspondence schools) must use a survey annually to collect general family income information. This survey is not an in-depth household application for school lunch purposes, but meets the requirements to determine economically disadvantaged status for Title I, School Accountability, and E-Rate. A sample survey and instructions are posted on the EED website at <http://education.alaska.gov/tls/TitleIA/>. This survey will be updated with the new income data after July 1 of each year, so be sure to use the current data for the applicable school year in which you are giving the survey. (Note: Household application forms for school meals may *not* be used for survey purposes.)

6. How can we encourage families to turn in a survey if a school does not offer a lunch program or if the school is under Provision 3 or the Community Eligibility Provision?

The survey is worded to encourage families to complete it because it brings benefits to the school such as E-Rate and Title I funding. Correspondence or charter schools that have an application process are encouraged to include income questions as part of the application process rather than a separate survey in order to get the most accurate information from the greatest number of families.

7. How is a household application for school lunch different from an Income Survey for Title I?

A household application for free or reduced price lunches is a very detailed application that includes information about the family income. An Income Survey for Title I or E-Rate purposes is a simple survey that allows the family to check the income range and number of people in the family and to list the children enrolled in schools in the district. The district then uses the income level chart to determine which families meet the criteria to be considered economically disadvantaged.

8. Are migrant students considered economically disadvantaged?

Migrant students are categorically eligible for free lunch. Only the migrant eligible students in the family qualify for free lunch; siblings that are not migrant eligible do not qualify. Migrant students are eligible for free lunch and thus may be automatically considered as economically disadvantaged students for each school year in which they are migrant eligible students. For questions about identification of migrant students, contact EED's Migrant Education Program Manager, Nicole Bourque, at 465-6549 or nicole.bourque@alaska.gov.

9. Are homeless students considered economically disadvantaged?

Homeless students are considered categorically eligible for free lunch and thus may be automatically considered as economically disadvantaged students for the school year in which they are originally identified as homeless. For questions about identification of homeless students, contact EED's Homeless Education Program Manager, Kay Streeter, at 465-3826 or kay.streeter@alaska.gov.

10. Which district staff may have access to data on a child's economically disadvantaged eligibility status?

The actual household application data for a school lunch program is confidential. However, a student's eligibility status as economically disadvantaged is required for federal education programs including Title I, therefore the student eligibility status as economically disadvantaged must be available to applicable district staff for the purposes of those programs. (See "Part 7, Confidentiality/Disclosure of Eligibility Information" on page 69 of the *Eligibility Manuals for School Meals* posted on the EED website at <http://education.alaska.gov/tls/cnp/NSLP.html>.)

11. Which district staff needs this information?

District staff that may need this information include school lunch personnel, Title I coordinators, assessment and accountability staff, business managers, and superintendents. These staff should be familiar with these requirements.

12. Who should I contact if I have questions about school lunch programs and eligibility for free or reduced lunches?

Contact the EED National School Lunch Program Coordinator Elizabeth Seitz at 465-8709 (elizabeth.seitz@alaska.gov) or Jo Dawson, Child Nutrition Program Administrator at 465-8708 (jo.dawson@alaska.gov).

13. Who should I contact if I have questions about criteria for economically disadvantaged status for Title I programs, for accountability for the economically disadvantaged subgroup, or for school poverty data for Title I allocations?

Contact the EED Title I Program Manager for your district or contact Margaret MacKinnon, Title I/ESEA Administrator at 465-2970 or margaret.mackinnon@alaska.gov.